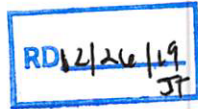


# THE BERKMAN LAW OFFICE, LLC

111 Livingston Street, Suite 1928  
Brooklyn, New York 11201

Tel: (718) 855-3627



Fax: (718) 855-4696

December 16, 2019

**BY ECF**

Hon. Raymond J. Dearie  
United States District Judge  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

12/20/19  
Schedule approved  
application granted.  
s/RJD  
[Signature]

Re: *Lelchook, et al. v. Société Générale de Banque au Liban S.A.L.*,  
19-cv-00033 (E.D.N.Y.)

Dear Judge Dearie:

We represent the plaintiffs in the above-referenced action. The plaintiffs filed their First Amended Complaint ("FAC") on December 9, 2019. (DE 73). We now write jointly on behalf of all parties, and further to the Court's October 17, 2019 Order, to request that the Court enter the following schedule for the filing of and briefing on the motion to dismiss the FAC that defendant Société Générale de Banque au Liban S.A.L. ("SGBL") intends to file:

- SGBL's motion to dismiss the FAC shall be filed on or before February 7, 2020;
- Plaintiffs' opposition to SGBL's motion shall be filed on or before April 6, 2020; and
- SGBL's reply in further support of its motion shall be filed on or before May 6, 2020.

Counsel for SGBL, Michael Sullivan, Esq., has authorized the undersigned to inform the Court that he consents to, and respectfully requests that the Court endorse, the above schedule

Additionally, given the number of procedural and substantive issues raised by the FAC and/or which SGBL intends to raise in its motion to dismiss (e.g., personal jurisdiction, estoppel, primary liability under the Anti-terrorism Act ("ATA"), secondary liability under the ATA, and successor liability) the parties respectfully request leave to file legal memoranda not to exceed 50 pages in support of and in opposition to the motion to dismiss and for SGBL to file a reply memorandum not to exceed 20 pages.

We thank the Court for its consideration.

Respectfully,

Robert J. Tolchin

Cc: All counsel of record by ECF